

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PATRICIA COHEN.

Plaintiff,

V.

STEVEN COHEN, DONALD COHEN, BRETT LURIE, EDWARD BAO, SAC CAPITAL MANAGEMENT, INC., DONALD T. COHEN C.P.A., P.A., and GRUNTAL & CO. L.L.C.,

Defendants.

Hon. Richard J. Holwell

Case No.: 09 CV 10230 (RJH)

ECF CASE

**DECLARATION OF DR. GAYTRI D. KACHROO IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL**

I, Dr. Gaytri D. Kachroo, hereby declare pursuant to 28 U.S.C § 1746:

1. I am an attorney admitted to practice, and in good standing, in this District. am the principal of Kachroo Legal Services, P.C., and counsel of record for Plaintiff Patricia Cohen ("Plaintiff") in this action. I submit this declaration in support of the Motion to Withdraw as Counsel of Record.

2. This action was commenced on December 16, 2009, by attorney Paul Batista ("Batista"). Batista was subsequently terminated, and this Court granted his motion to withdraw on January 25, 2010. Kachroo Legal Services, P.C. ("KLS") was retained as counsel in late December 2009, after this action had been filed.

3. After extensive research and investigation, KLS filed an amended complaint on behalf of Plaintiff on April 7, 2010. In addition to its investigation and research, KLS has responded to significant substantive correspondence concerning the claims and attended a status hearing in this action. On May 7, 2010, certain defendants

filed a motion to dismiss this action. KLS has diligently worked to research and draft an opposition to this motion to dismiss, which it believes is without merit. The instant motion to withdraw has not been filed for any substantive reason related to the merits of this action.


4. Plaintiff, however, has been unable to meet her financial obligations to KLS given the time and effort prosecuting this action has required. KLS is not in a position to continue without the financial payments Plaintiff is obligated to make under her retention agreement. On June 5, 2010, Plaintiff notified me that she would prefer to terminate our representation at this time.

5. Plaintiff has not provided any additional instruction regarding this action, and was notified on June 5, 2010 that in light of her termination, I was obligated to make this motion. I have no authority to make any other motion or take any other action on her behalf.

6. For all the foregoing reasons, I respectfully request that the Court grant the motion to withdraw as counsel.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed on June 9, 2010


Dr. Gaytri D. Kachroo (GK2010)

Kachroo Legal Services, P.C.
Kendall Square Center
245 First Street, Suite 1800
Cambridge, MA 02142
(617) 444-8779
(617) 864-1125 (Fax)

gkachroo@kachroolegal.com

Counsel for Plaintiff Patricia Cohen